

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

PENDLETON HEIGHTS GAY-STRAIGHT)	
ALLIANCE, an unincorporated association,)	
)	
Plaintiff,)	
)	
v.)	No. 1:21-cv-02480-JRS-TAB
)	
SOUTH MADISON COMMUNITY)	
SCHOOL CORPORATION, <i>et al.</i> ,)	
)	
Defendants.)	

Declaration of Ann D'Angelo

Ann D'Angelo, being duly sworn, says that:

1. I am the Litigation Support Manager at the ACLU of Indiana.
2. I have listened to selected Pendleton Heights High School Daily Announcements for the 2020-2021 school year that can be found at <https://audioboom.com/playlists/4633761-2020-2021>. The announcements are from February 1, 2021 to May 26, 2021.
3. I have also listened to the Pendleton Heights High School Daily Announcements that can be found at <https://audioboom.com/channels/5043510> for the 2021-2022 school year from August 5, 2021 to December 8, 2021.
4. Each announcement is in a separate audio file organized by date.

5. I have copied all the announcements on a flash drive that I understand is being separately filed contemporaneously with the filing of this declaration.

6. The announcements frequently begin with information from the guidance department, information about school sports, and/or other school-related matters. The announcements then often have a portion that begins with the announcer stating: "Now here is the latest from around our campus and the community." This is then followed by the mention of what I presume to be clubs or organizations with a description of upcoming meetings, events, or other club activities. An exception to this were the announcements of February 2, 2021 and February 5, 2021, where the announcement concerning Rugby was preceded by the statement that it was from the Athletic Department.

7. A particular club or organization announcement of a meeting or event is regularly repeated leading up to the meeting or event that is described. For example, on October 1, 2021, there was an announcement for the Outdoor Adventure Club that said:

Have you ever wanted to climb on cliffs? How about snow skiing or snowboarding? Do you like camping, hiking, kayaking down a river? Have you ever walked and crawled through a cave? Does paint ball sound like fun? These are some of the possibilities when you join the Outdoor Adventure Club. Come to a call out meeting Wednesday the 6th of October in Room 220, Mr. Hinton's room, either before school at 7:10 or after school at 2:35.

The above announcement was repeated, in substantially similar form, on October 4th, 5th, and 6th.

8. I have listed the announcements made for what I assume to be clubs or organizations that are mentioned on the Pendleton Heights High School Daily Announcements for the dates specified below. If there were no club or organization meetings announced, only the date is listed. I have listed all dates that I have reviewed below. There are some calendar dates when there is not a Daily Announcement listed on the website and those dates are omitted from the listings below.

2020-2021 School year

February:

1	
2	Rugby
5	Rugby
8	
9	
10	
11	German Club
12	
19	German Club
22	German Club
23	
24	
25	
26	

March

1	
2	Girls only Try Wrestling and Rugby Day
3	Girls only Rugby and Wrestling Clinic, German Club

4 Girls only Try Rugby and Wrestling Clinic was a success, with
contact information to contact Mr. Trout if want to participate in
current season of Rugby , German Club
5 German Club
8 German Club
9
10
11
12
29
30
31

April

1
2 Bring Change to Mind
5 Bring Change to Mind
6 Bring Change to Mind
7 Bring Change to Mind, Beta Club
8
9
12
13
14 German Club
15 German Club
16 German Club
19 German Club
20
21
22
23
26
27
28
29 Beta Club
30 Beta Club

May

3
4 Best Buddies
5 Best Buddies
6
7
10
11 German Club
12 German Club
13 German Club
14 German Club
17
18
19
20
21
24 Best Buddies
25 Best Buddies
26 Best Buddies

2021-2022 School year

August 2021:

5
6
9 Beta Club
10 Beta Club; Bring Change to Mind
11 Beta Club; Bring Change to Mind
12 Beta Club; Bring Change to Mind
13 Beta Club; Bring Change to Mind; German Club; Best Buddies
16 Beta Club; Bring Change to Mind; German Club; Best Buddies
17 Beta Club; Bring Change to Mind; German Club; Best Buddies
18 Bring Change to Mind; German Club; Best Buddies
30 German Club; SADD
31 SADD

September 2021:

1	SADD; FCCLA
2	SADD; FCCLA
7	FCCLA; FFA
8	FCCLA; FFA
9	FSSLA; FFA; Best Buddies; The Muse
10	FCCLA; FFA; Best Buddies; The Muse
13	FCCLA, The Muse; FFA
14	FCCLA; The Muse; FFA
15	
16	
17	
20	German Club; Art Club
21	Art Club
22	Art Club
23	
24	
27	Beta Club
29	Beta Club
30	Beta Club

October 2021:

1	Beta Club; Outdoor Adventure Club
4	Outdoor Adventure Club
5	Outdoor Adventure Club
6	Outdoor Adventure Club; German Club
7	German Club
8	German Club
18	German Club
19	Best Buddies; Art Club
20	Best Buddies
21	Best Buddies
22	Best Buddies; Social Studies Academic Team; JAG Leadership Team
26	Best Buddies; Social Studies Academic Team
27	Best Buddies
28	Best Buddies
29	

November 2021:

1 Best Buddies
2 Best Buddies
3 Best Buddies
4 Best Buddies
5 Best Buddies
8
10 Outdoor Adventure Club
11 Outdoor Adventure Club; German Club
12 Outdoor Adventure Club; German club
15 Outdoor Adventure Club
16 Outdoor Adventure Club; German Club
17 Outdoor Adventure Club; German Club
18 German Club
19 German Club
22 German Club
23
29
30 Beta Club; Spanish Club

December 2021

1 Beta Club; Spanish Club; Outdoor Adventure Club
2 Beta Club; Spanish Club; Outdoor Adventure Club
3 Beta Club; Outdoor Adventure Club
6 Beta Club; Outdoor Adventure Club
7
8

Verification

I verify under the penalty of perjury that the foregoing is true and correct.

Executed on: 12/16/21
(DATE)


Ann D'Angelo

Prepared by:

Kenneth J. Falk
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